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12 Attorneys for Defendant UKIAH ADVENTIST HOSPITAL
13 aka UKIAH VALLEY MEDICAL CENTER

14
15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO

17 DR. ALAN SAMPSON M.D. & KATHY
18 SAMPSON on behalf of the ESTATE OF
19 ANDREW SAMPSON,

20 Plaintiffs,

21 vs.

22 UKIAH VALLEY MEDICAL CENTER;
23 ADVENTIST HEALTH; DEBBIE L. MARKS,
24 MD; CALSTAR; & the DEPARTMENT OF
CALIFORNIA HIGHWAY PATROL; and
DOES 1 through 10,

25 Defendants.

26 CASE NO. 3:15-CV-00160-WHO

27 **STIPULATION AND ORDER
TO CONTINUE THE TIME TO FILE A
MOTION FOR SUMMARY JUDGMENT
AND FOR HEARING ON THE MOTION
FOR SUMMARY JUDGMENT**

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29 **IT IS HEREBY STIPULATED** between Plaintiffs DR. ALAN SAMPSON M.D. & KATHY
30 SAMPSON, on behalf of the ESTATE OF ANDREW SAMPSON (“Plaintiffs”) and Defendant
31 UKIAH ADVENTIST HOSPITAL aka UKIAH VALLEY MEDICAL CENTER (“Defendant”), by and
32 through their respective attorneys of record as follows:

33 Good cause appearing therefore in order to complete Mediation prior to the necessity of filing the
34 anticipated Motion for Summary Judgment by Ukiah Adventist Hospital aka Ukiah Valley Medical Center and
35 opposition by Plaintiffs, the Parties stipulate and request the Court order that the cut off for hearing dispositive
36 motions be continued from June 7, 2017 to June 28, 2017, with the filing of such motion to be commensurate with
4819-8422-1767.1

3:15-CV-00160-WHO

37 **STIPULATION AND ORDER TO CONTINUE THE TIME TO FILE A MOTION FOR SUMMARY
JUDGMENT AND FOR HEARING ON THE MOTION FOR SUMMARY JUDGMENT**

1 the continued hearing cut-off date of June 28, 2017 for UKIAH ADVENTIST HOSPITAL aka UKIAH
2 VALLEY MEDICAL CENTER's anticipated Motion for Summary Judgment.

3 IT IS SO STIPULATED.

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5 DATED: April 28, 2017

LEWIS BRISBOIS BISGAARD & SMITH LLP

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By: /s/ Reuben B. Jacobson

Reuben B. Jacobson

Carol Sleeth

Sandra K. Indech

Attorneys for Defendant UKIAH ADVENTIST HOSPITAL
aka UKIAH VALLEY MEDICAL CENTER

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DATED: April 26, 2017

MILLSTEIN & ASSOCIATES

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By: /s/ Gerald S. Richelson

David J. Millstein, Esq.

Gerald S. Richelson, Esq.

Attorneys for Plaintiffs

DR. ALAN SAMPSON M.D. &

KATHY SAMPSON on behalf of the

ESTATE OF ANDREW SAMPSON

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PROPOSED] ORDER

2 GOOD CAUSE APPEARING THEREFORE, based on the request and stipulation of the
3 parties and in order to complete mediation prior to the necessity of filing and opposing the anticipated
4 Motion for Summary Judgment by UKIAN ADVENTIST HOSPITAL aka UKIAH VALLEY
5 MEDICAL CENTER, the Court orders that the cut-off for hearing dispositive motions be continued
6 from June 7, 2017 to June 28, 2017 with the filing of such motion to be commensurate with the
7 continued hearing cut-off date of June 28, 2017 for UKIAH ADVENTIST HOSPITAL aka UKIAH
8 VALLEY MEDICAL CENTER's anticipated Motion for Summary Judgment.

10 | DATED: May 12,2017

The Honorable
Judge of the United States District Court